

KEVIN KERVENG TUNG, P.C.

Attorneys and Counselors at Law

Writer's direct email:
Kevin K. Tung, Esq.
ktung@kktlawfirm.com
Admitted in NY and NJ

Queens Crossing Business Center
136-20 38th Avenue, Suite 3D
Flushing, New York 11354
Tel: (718) 939-4633
Fax: (718) 939-4468

www.kktlawfirm.com

May 26, 2023

VIA ECF

Honorable Pamela K. Chen
United States District Judge
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. McMahon, et al.
Docket No. 21-265

Dear Honorable Pamela K. Chen:

As you know, we are the counsels for the defendant, Yong Zhu. We are writing to join the request made by Defendant Michael MaMahon's counsel's letter application dated May 25, 2023, (ECF Filing Document# 224).

The Court shall not enter an Order to preclude the introduction of the Civil action pending in the Superior Court of New Jersey with Index No.# ESX-L-002889-18 at this time, because this civil lawsuit provides certain exculpatory evidence that substantiates Defendant Yong Zhu's defense that he was asked to find the person for the purpose to collect a private debt in the United States. Whether or not Defendant Yong Zhu's defense to collect a private debt or carries an governmental function is for the jury to decide.

Should you have any question, feel free to contact the undersigned.

Very truly yours,



Kevin K. Tung